

IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF PENNSYLVANIA

William Clark,
Plaintiff

vs.

Martin Horn, et al.,
Defendants

ORIGINAL

No.: 1:CV-01-0764

(Judge Caldwell)

Jury Trial Demanded

74
8-22-02
Sc
FILED
HARRISBURG, PA

AUG 22 2002

MARY E. D'ANDREA, CLERK
Per
Deputy Clerk

Plaintiff's Motion For Appointment Of Counsel

Now comes the Plaintiff, William Clark, pro se, and hereby requests this Honorable Court grants "Plaintiff's Motion For Appointment Of Counsel".

Statement Of Case

A. Identity Of The Parties:

Plaintiff, William Clark, is currently incarcerated at the State Correctional Institution at Rockview.

The Department of Corrections employees named as defendants ("Corrections Defendants") are "Martin Horn, Robert Meyers, and Larry Lidgett", by and through their attorney, John J. Talaber, Assistant Counsel for the Department of Corrections.

Additional defendants, named "Wexford Health Sources, Inc.", and "Wexford Medical Director, Dr. John Symons", ("Wexford Defendants"), by and through their attorney, James D. Young, Esq.

B. Relevant Procedural History:

On December 1, 1999, plaintiff filed an "Official Inmate Grievance", (see DC-804-ROC-0706-99).

On August 10, 2001, plaintiff filed an "Official Inmate Grievance", (see DC-804-ROC-0641-01).

Plaintiff, William Clark, pro se, filed this Complaint on May 21, 2001. (see Complaint, Doc. 1)

On January 2, 2002, plaintiff served "Corrections Defendants" with: a request for Production of Documents, which plaintiff has corrected on June 11, 2002 (see Praecipe To Substitute).

On February 4, 2002, "Corrections Defendants" sought an Enlargement of Time to respond to plaintiffs aforementioned Discovery requests. (see Doc. 15)

The Court, by Order dated February 8, 2002, granted the "Corrections Defendants" Motion directing them to respond to plaintiffs Discovery requests on or before March 21, 2002. (see Doc. 16)

On March 21, 2002, "Corrections Defendants" served plaintiff with a Response to his Request for Production of Documents. (Doc. 19, Exhibit D)

On March 25, 2002, the "Corrections Defendants" filed a Motion for a Protective Order, with a Supporting Brief and Documents. (Doc. 17-19)

Additionally, that same day the "Corrections Defendants" filed a Motion for Summary Judgement. (Doc. 25)

On April 12, 2002, plaintiff filed "Brief in Opposition to Corrections Defendants' Motion for a Protective Order" and also enclosed letter to the Court explaining his legal aid problem.

On April 18, 2002, plaintiff initiated the Production of Medical Records to pursue the "Discovery Process".

On April 30, 2002, "Corrections Defendants" file "Corrections Defendants' Reply To Plaintiffs Brief In Opposition To Their Motion For A Protective Order". (hereafter "Corrections Defendants Reply")

On May 15, 2002, plaintiff filed "Plaintiff's Response".

On May 20, 2002, by Memorandum and Order, this Honorable Court denied the "Corrections Defendants" Motion for a Protective Order and directed defendants Horn and Lidgett to respond to plaintiffs Interrogatories within forty five (45) days.

Rule 34; "Production of Documents..."(a)-(c).

Plaintiff has in "good faith" attempted throughout the period of time since his loss of "paralegal" help wherein Corrections Defendants" cut him off from said help by Mr. Lassen, to proceed through these complex proceedings.

ALL motions filed by plaintiff since "Plaintiff's Response" filed May 15, 2002, explains and displays his troubles and lack of experience, thus showing how he has been prejudiced and disadvantaged by the Defendants actions and inactions wherein he has been baffled and thwarted of pertinent process and proceedings necessary for the minimal presentation of the actual claims.

Plaintiff is disadvantaged and has been inundated as documented in prior motions to this Honorable Court, and lacks knowledge and expertise to correct and amend properly the initial defects and subsequent aggravating factors connected to the initial grievance.

Wherefore, Plaintiff respectfully requests, due to all the unattended pertinent processes that must be established and the complexity and difficulty that Plaintiff is unable to meet, Plaintiff requests this Honorable Court grant his "Motion For Appointment Of Counsel", and appoint Counsel so he may not be disadvantaged and prejudiced in his presentation of this meritorious Petition.

Date Mailed: 8/20/02

Respectfully Submitted,



William Clark, pro se

Box A AY-5585

Bellefonte, Pa. 16823

12/8/00

EXH. 3C

ORIGINAL

William M. Clark
S.C.I. @ Rockview
Inmate No. AY-5585
Belleville, PA. 16823

01-CV-764

FILED
HARRISBURG, PA

AUG 22 2002

MARY E. D'ANDREA, CLERK
Per 9/8

To Whom it may concern,

I AM CURRENTLY INCARCERATED AT ROCKVIEW WHERE IN OCTOBER 1999 I WAS TOLD I HAVE HEPATITIS C AFTER I INITIATED TESTING FOR HEP. C AND FOR HIV. AT THE TIME I WAS BECOMING EASILY FATIGUED AND SLEEPING ALOT.

I WAS INFORMED SHORTLY AFTERWARD THAT I WAS NEGATIVE FOR H.I.V. BUT TOLD I HAD THE HEPATITIS C VIRUS AND THAT BY WHAT THE RECORDS SHOWED, I HAD HAD IT SINCE AT LEAST 1992. I WAS NEVER INFORMED OF THIS FACT, EITHER AT THAT TIME OR ON 2 SUBSEQUENT INCARCERATIONS FOR PAROLE VIOLATIONS. I FEEL BY THIS OMISSION THAT I WAS NEVER AFFORDED AN OPPORTUNITY TO CHANGE MY LIFESTYLE, SEEK MEDICAL ATTENTION, CHANGE MY EATING HABITS, ETC. ALL THINGS I NOW KNOW I NEED TO DO.

HEPATITIS C IS A PROGRESSIVE LIVER DISEASE AND THE PREVAILING OPINION IS THAT EARLY DIAGNOSIS AND TREATMENT IS THE MOST BENEFICIAL COURSE OF ACTION.

EVEN AFTER I WAS INFORMED OF MY DIAGNOSIS, IT TOOK THE DEPT. OF CORRECTIONS (D.O.C.) MEDICAL DEPT. ANOTHER ELEVEN MONTHS TO FINALLY BEGIN TREATMENTS. EVEN TO THIS

EXH. 3D

TIMOTHY M. KOLMAN ESQ.
AND ASSOCIATES
LAW OFFICES

LONDON OFFICE
193 OLDFIELD LANE
GREENFORD, MIDDLESEX
LONDON, BOROUGH OF EALING
UB6 8PN
UNITED KINGDOM
(081) 578-2878

225 N. FLOWERS MILL ROAD
THE SHOPPES AT FLOWERS MILL
LANGHORNE, PA 19047

(215) 750-3134
FACSIMILE (215) 750-3138

PHILADELPHIA OFFICE
1207 CHESTNUT STREET
PHILADELPHIA, PA 19107
(215) 985-0088

OF COUNSEL SARA L. GOREN
ALSO A MEMBER OF THE N.J.

December 4, 2000

Ian Clarke
82 North Drive
Holland, PA 18966

RE: William Clarke

Dear Ian:

Thank you for contacting me regarding William and I regret that I was unable to speak with you this week, however, I have had an opportunity to review Ian's matter and other matters involving the other prisoners at Rock View. This is indeed a very good case and it should be litigated, and quickly. The problem is that on review, I do not believe that my firm has the necessary legal power, at this time, to properly undertake a full class action law suit against the Commonwealth of Pennsylvania.

It is not that I do not wish to take the case, it is simply that I cannot at the present time owing to my very limited resources.

I do hope that William will understand and I very much regret my inability at this time.

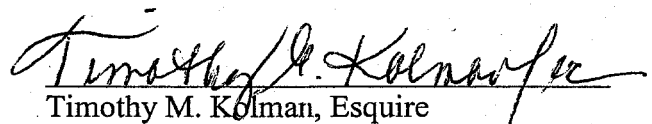
I will, however, discuss this matter with other class action law firms but cannot promise that they will be interested in the case.

Thank you very much for allowing me the privilege of considering this case.

Very truly yours,

TIMOTHY M. KOLMAN & ASSOCIATES

By:


Timothy M. Kolman, Esquire

TMK/lc

EXH. 3E

LAW OFFICES
WILLIG, WILLIAMS & DAVIDSON
TWENTY-FOURTH FLOOR
1845 WALNUT STREET
PHILADELPHIA, PENNSYLVANIA 19103

(215) 656-3600

FAX: (215) 561-3135
DIRECT DIAL NUMBER:

215-656-3672

September 27, 2001

HARRISBURG OFFICE
P.O. Box 11997
HARRISBURG, PA 17108-1997
(717) 221-1000

NEW JERSEY OFFICE
38 HADDON AVENUE
HADDONFIELD, NJ 08033
TEL: (856) 616-0606
FAX: (856) 616-0064

OF COUNSEL
WILLIAM L. BOWEN
NEW JERSEY MANAGING ATTORNEY

JOHN C. THOMAS
SIDNEY H. LEHMANN

200800-001

DEBORAH R. WILLIG*
ALAINE S. WILLIAMS†
STUART W. DAVIDSON*
NANCY B. G. LASSEN
RALPH J. TETI
NANCY J. MCCAULEY†
WAYNE WYNN
DEBORAH M. LERNER
PATRICIA V. PIERCE†
LAURENCE M. GOODMAN†
WARREN D. LEVY†
LINDA M. MARTIN†
IRWIN W. ARONSON

LOUISE F. PONGRACZ
MATTHEW I. WHITEHORN†
HANNAH SCHWARZSCHILD†
JAMES S. BEALL
THEODORE P. DIMUZIO
AMY L. ROSENBERGER†
SUSAN BAHME BLUMENFELD
ERIC M. FINK†
JAMES A. FUNT†
MICHAEL G. DRYDEN
NATALIE KLYASHTORNY†
KIMBERLY NEEB*
RICHARD G. POULSON
DONNA M. CANTOR†
SCOTT B. GOLDBERG†
DAVID H. LIPOW†
JENNIFER P. BARZESKI†
JOHN T. KUPCHINSKY

ALSO ADMITTED IN:
■ DISTRICT OF COLUMBIA
† NEW JERSEY
▲ NEW YORK

William Clark
c/o Ian Clark
82 North Drive
Holland, PA 18966

Re: Clark, William C. v. Wexford Health Sources, Inc., et al.

Dear Mr. Clark:

It was good to talk with you this week regarding your son William's lawsuit against the Department of Corrections and Wexford Health Systems. Unfortunately, and as I mentioned during our conversation, this firm will not be able to represent your son in that action.

I should also point out that any opinions that I may have expressed to you during the course of our telephone conversations were made on the basis of the factual circumstances as I understood them and my recollection of the relevant legal doctrines. No reliance should be placed on any of the opinions or views expressed by me. Moreover, you should not assume that our decision to decline your case represents any expression whatsoever as to its merits.

I suggest that you consult with other counsel regarding your son's suit as soon as possible, as this firm will accept no responsibility to advise or represent you in this matter.

WILLIG, WILLIAMS & DAVIDSON

WILLIG, WILLIAMS & DAVIDSON

Ian Clark
September 27, 2001
Page 2

Good luck to you and to your son. And thank you for your consideration.

Very truly yours,

A handwritten signature in black ink, consisting of several loops and a trailing line, representing the name Richard G. Poulson.

RICHARD G. POULSON

/rgp

DC-804
PART 1

EXH. B

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF CORRECTIONS
P.O. BOX 598
CAMP HILL, PA. 17001-0598

OFFICIAL INMATE GRIEVANCE

GRIEVANCE NO.

ROC-0641-01

TO: GRIEVANCE COORDINATOR JEFFREY RACKOVAN	INSTITUTION ROCKVIEW	DATE 8/10/01
FROM: (Commitment Name & Number) WILLIAM M. CLARK AY-5585	INMATE'S SIGNATURE <i>William M. Clark</i>	
WORK ASSIGNMENT BLOCK WORKER	QUARTERS ASSIGNMENT EB	

INSTRUCTIONS:

1. Refer to the inmate handbook Page 12 and DC-ADM 804 for information on the inmate grievance system.
2. State your grievance in Block A in a brief and understandable manner.
3. Next, you are required to list in Block B the specific actions you have taken to resolve this matter. Be sure to include the identity of staff members you have contacted.

A. Brief, clear statement of grievance:

DURING A CONSULTATION ON AUGUST 7, 2001 WITH DR. SYMONS, WAS INFORMED THAT THE LIVER BIOPSY HE FELT I NEEDED + REQUESTED IN JULY, 2001 WAS DENIED, NO REASON OR ALTERNATIVE WAS GIVEN. APPROXIMATELY 3 DAYS LATER DR. SYMONS APPEALED THE DECISION AND IT ALSO WAS DENIED. DR. SYMONS ADVISED ME THAT THE ALTERNATE PLAN WAS TO HAVE ME GENOTYPED. I ASKED IF THIS WOULD TELL US THE EXTENT OF DAMAGE TO MY LIVER AND HE SAID IT WOULD NOT, THAT IT MAY HELP AS FAR AS HOW TO TREAT. (GENOTYPING SHOULD HAVE BEEN DONE BEFORE ANY TREATMENT STARTED.) THE FACT THAT I DID NOT RESPOND TO THE RIBAVARIN/INTERFERON TREATMENT AND THE CONSTANT UNBEARABLE ITCHING CONCERNED DR. SYMONS ENOUGH THAT AT LEAST A PHYSICIAN HERE AT ROCKVIEW REQUESTED THE BIOPSY, SOMETHING I HAVE BEEN REQUESTING FOR ALMOST 2 YEARS NOW. MY SECOND CONCERN IS (SEE PG. 2 STATEMENT)

B. Actions taken and staff you have contacted before submitting this grievance:

MY CONTACT WAS WITH DR. SYMONS AND BOTH REQUESTS CONCERNING THIS GRIEVANCE WERE DENIED (SEE ABOVE). I DID NOT CONTACT LARRY LIDGETT AS I WAS INFORMED WEXFORD MADE THE ABOVE DECISIONS.

Your grievance has been received and will be processed in accordance with DC-ADM 804.

Jeffrey Rackovan
Signature of Grievance Coordinator

PART 1
Medical. OF. 2

Mr. Lidgett 8/21

8/14/01

Date

Rw 8/28

DC-804
PART 1COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF CORRECTIONS
P.O. BOX 598
CAMP HILL, PA. 17001-0598

OFFICIAL INMATE GRIEVANCE

GRIEVANCE NO.

ROC 0641-01

TO: GRIEVANCE COORDINATOR JEFFREY RACKOVAN	INSTITUTION ROCKVIEW	DATE 8/10/01
FROM: (Commitment Name & Number) WILLIAM M. CLARK AY-5585	INMATE'S SIGNATURE <i>William Clark</i>	
WORK ASSIGNMENT BLOCK WORKER	QUARTERS ASSIGNMENT EB	

INSTRUCTIONS:

1. Refer to the inmate handbook Page 12 and DC-ADM 804 for information on the inmate grievance system.
2. State your grievance in Block A in a brief and understandable manner.
3. Next, you are required to list in Block B the specific actions you have taken to resolve this matter. Be sure to include the identity of staff members you have contacted.

A. Brief, clear statement of grievance (CONT.)

THAT I SHOULD BE RECEIVING THE NEW TREATMENT (PEGOLATED INTERFERON) BECAUSE OF MY NON-RESPONSIVENESS TO THE ORIGINAL TREATMENT. AT MY 8/7/01 CONSULTATION WITH DR. SYMONS HE STATED THAT BECAUSE MY IRON COUNTS WERE SO HIGH DURING THE ORIGINAL TREATMENT (WHICH CAN ~~BE~~ RESULT IN NEGATIVE EFFECT OF TREATMENT), THAT I SHOULD HAVE BEEN DISCONTINUED ON THE INTERFERON/RIBAVIRIN AND BEEN PHEBOTOMIZED (BLED) TO GET THE IRON COUNTS DOWN TO NORMAL RANGES (WAS DONE ONLY AFTER THE SIX (6) MONTH TREATMENT PERIOD). DR SYMONS ALSO STATED THAT A LIMITED NUMBER OF INMATES, WHOSE VIRAL LOAD WAS NOT EXCESSIVE & WHO FAILED TO RESPOND TO THE FIRST TREATMENT, IS BEING APPROVED. FOR THESE REASONS AND BECAUSE I FEEL THE MEDICAL DEPT. WAS NEGLECTFUL DURING MY FIRST PERIOD OF TREATMENT, I AM REQUESTING TO START THE NEW TREATMENT WITHOUT DELAY. (RIBAVIRIN COULD BE ADDED WHEN APPROVED) AND A BIOPSY.

B. Actions taken and staff you have contacted before submitting this grievance:

SEE PART 1

2282

COOKED IN 10/15

N. HITHAN

Your grievance has been received and will be processed in accordance with DC-ADM 804.

Signature of Grievance Coordinator

Date

DC-804
Part 2COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF CORRECTIONS
P.O. BOX 598
CAMP HILL, PA 17001Revised
December 2000OFFICIAL INMATE GRIEVANCE
INITIAL REVIEW RESPONSE

GRIEVANCE NO.

#ROC-0641-01

TO: (Inmate Name & DC No.)	FACILITY	HOUSING LOCATION	GRIEVANCE DATE
William Clark, AY-5585	SCIR	Bldg E/B	08/10/01 Received 08/14/01

The following is a summary of my findings regarding your grievance:

A review of this inmate's medical record was done.

This grievance was filed August 10, 2001. Blood work for genotyping was done August 9, 2001.

Pegolated interferon is not yet on the market for administration but will be in the near future.

The details given by this inmate describes all the care, concern and treatment given to this inmate by Dr. Symons. Ongoing treatment is occurring.

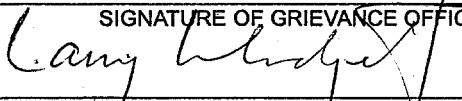
JAR:tlk

c: Deputy Tennis
Deputy Whitman
Mr. Lidgett
Ms. Foose
Mr. Price
Case Record
Mr. Rackovan

Print Name & Title of Grievance Officer

SIGNATURE OF GRIEVANCE OFFICER

DATE

 CHCA

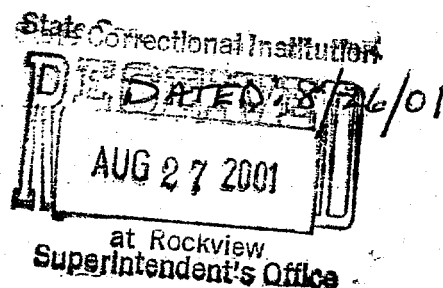
8-22-01

TO: FACILITY
MANAGER

FROM: WILLIAM CLARK
#AY-5585

APPEAL OF GRIEVANCE

RE: # ROC-0641-01 Pg. 1



THIS APPEAL IS IN RESPONSE TO THE INITIAL REVIEW BY LARRY LIDGETT I RECEIVED ON 8/23/01. MY FIRST CONCERN IN MY GRIEVANCE IS THAT SINCE I WAS INFORMED OF MY HEPATITIS C IN OCTOBER OF 1999 I HAVE CONTINUALLY ASKED FOR AND BEEN REFUSED A LIVER BIOPSY. NOW, AFTER 22 MONTHS, DR. SYMONS REQUESTS THE BIOPSY BECAUSE OF MY BLOOD TESTS (LAB RESULTS, INCLUDING ANOTHER RISE IN MY ALPHAFETA PROTEIN LEVEL) AND THE INCESSANT ITCHING I SUFFER.

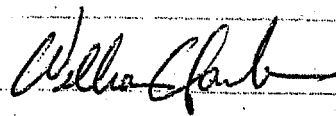
THIS PRIMARY CONCERN WAS NEVER ADDRESSED IN THE INITIAL REVIEW RESPONSE. THE ALTERNATIVE TO A BIOPSY WAS ADDRESSED, STATING THAT GENOTYPING WAS DONE. WHAT WAS NOT ADDRESSED IS THE FACT THAT THIS TEST DOES NOTHING TO DIAGNOSE THE LEVEL OF DAMAGE TO MY LIVER.

IT ALSO DOES NOT RESPOND TO MY STATEMENT IN THE ORIGINAL GRIEVANCE THAT GENOTYPING SHOULD BE DONE BEFORE ANY TREATMENT BEGINS AND WAS NOT. MY GRIEVANCE ALSO ASKS FOR PEGOLATED INTERFERON FOR THE REASONS STATED WITHIN (PG. 2 OF DC-804). MR. LIDGETT'S REPLY IS THAT THIS TREATMENT IS NOT YET ON THE MARKET FOR ADMINISTRATION. I DO NOT UNDERSTAND THIS STATEMENT, BUT I DO KNOW THIS TREATMENT WAS APPROVED BY THE FDA IN JANUARY, 2001. BECAUSE OF THE REPLY GIVEN THERE IS NO RESPONSE TO MY CONCERNS ABOUT MY IRON COUNTS AND NOTHING ABOUT THE INITIAL TREATMENT FAILURE. THE LAST STATEMENT IN THE RESPONSE SAYS "DETAILS GIVEN BY ME DESCRIBE CARE, CONCERN AND TREATMENT BY DR. SYMONS" AND THAT ONGOING TREATMENT IS

APPEAL OF GRIEVANCE

RE: # ROC-0641-01 Pg. 2

OCCURRING. I SPECIFICALLY STATE IN MY GRIEVANCE "... CONCERNED DR. SYMONS ENOUGH THAT AT LEAST A PHYSICIAN HERE AT ROCKVIEW REQUESTED THE BIOPSY, SOMETHING I HAVE BEEN REQUESTING FOR ALMOST 2 YRS. NOW." (PG. 1 OF DC-804 PART 1) EXCEPT FOR ATARAX, WHICH WAS PRESCRIBED FOR MY ITCHING AND DOES NOT WORK FOR ME NOW OR IN THE PAST, NO ONGOING TREATMENT IS OCCURRING AT THIS TIME. I AGAIN REQUEST A LIVER BIOPSY AND THE PEGOLATED INTERFERON TREATMENT FOR THE REASONS STATED ABOVE AND IN MY ORIGINAL GRIEVANCE.

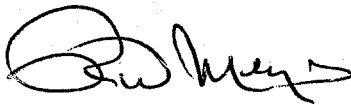
 AY-5585
WILLIAM CLARK

DATED: 8/26/01

COMMONWEALTH OF PENNSYLVANIA
Department of Corrections
State Correctional Institution at Rockview
(814) 355-4874
September 5, 2001

SUBJECT: Appeal to Grievance #ROC-0641-01

TO: William Clark, AY-5585
Building E/B



FROM: R. W. Meyers
Superintendent

Your medical situation is well known by our medical staff, Dr. Symons, and Wexford Health Sources. Everything that can be done is being done.

The liver biopsy was denied at utilization review. Pegolated interferon is not considered a part of your treatment protocol at this time according to Dr. Symons. The plan at present is to continue the genotyping and monitor your situation for any changes.

RWM:tlk

c: Deputy Tennis
Deputy Whitman
Mr. Lidgett
Ms. Foose
Mr. Price
Case Record
Mr. Rackovan

RECEIVED IN
INMATE DESK MAIL
9/7/01 wmc

9/9/01

TO: CHIEF, SECRETARY'S OFFICE OF INMATE GRIEVANCES AND APPEALS
RE: APPEAL TO FINAL REVIEW

GRIEVANCE # ROC-0641-01

WILLIAM CLARK

D.O.C. # AY-5585

My appeal to you is based on the contents of my first (initial) grievance and the appeal and the responses I got in both cases. In response to the appeal to the Facility Manager I feel nothing that could be being done is being done, including my request for a biopsy and the pegylated interferon. In that same response it states, "THE PLAN AT PRESENT IS TO CONTINUE GENOTYPING..." ONCE A GENOTYPE HAS BEEN DONE, WHAT IS THERE TO CONTINUE?

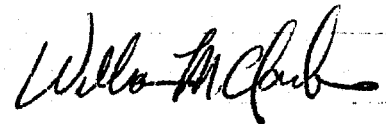
WITHOUT A BIOPSY, WHICH DR. SYMONS DID STATE TO ME SHOULD BE DONE, NO ONE CAN MAKE A CORRECT DIAGNOSIS TO WHAT PHASE LIVER DAMAGE I AM SUFFERING AT THIS TIME. HOW CAN ANYONE TREAT IF THEY DON'T KNOW THE EXTENT OF THE DAMAGE?

I DON'T KNOW WHO I AM ADDRESSING HERE EXCEPT FOR A TITLE, BUT PLEASE HEAR THIS. THE ITCHING I ENDURE IS EVERYDAY, MOST OF THE DAY AND WORSE AT NIGHT. IT GETS MADDENING. THE MEDICAL STAFF TELLS ME IT'S CAUSED BY LIVER DAMAGE, BUT I CAN GET NO DEFINITIVE ANSWERS

#ROC-0641-01
APPEAL TO FINAL REVIEW PG. 2

~~ALL THIS~~ WHEN I INQUIRE ABOUT TESTS, POSSIBLY ALLERGIC IN NATURE OR IRON COUNT (WHICH IS INCONSISTENT) OR THE POSSIBILITY OF CANCER (BECAUSE OF ALPHA ~~FE~~TA PROTEIN COUNTS), THE RISE ONCE AGAIN IN MY ALT'S + AST'S. THIS IS ALL VERY SCARY TO ME, THE NOT KNOWING WHAT'S GOING ON WITH MY BODY. I'VE BEEN GETTING VERY EXHAUSTED AGAIN LATELY, I HAVE ABDOMINAL PAIN ALOT AND I'M NOT GETTING ANSWERS. THIS FEAR TURNS INTO ANGER WHEN I'M TOLD EVERYTHING THAT CAN BE DONE IS BEING DONE WHEN ITS SO OBVIOUS THAT I FEEL NOTHING IS BEING DONE, AND IN THE LAST LINE TO SAY MY SITUATION IS BEING MONITORED FOR CHANGES. AT WHAT POINT DOES SOMETHING GET DONE?

I BEG YOU TO RECONSIDER THE PREVIOUS REPLIES I'VE GOTTEN AND ORDER A BIOPSY, PEGOLATED INTERFERON AND MORE TESTING TO GET TO THE BOTTOM OF THE INCESSANT ITCHING I ENDURE EVERYDAY. THANK YOU.



WILLIAM M. CLARK

AY-5585

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF CORRECTIONS
2520 LISBURN ROAD, P.O. BOX 598
CAMP HILL, PA 17001-0598

THE SECRETARY'S OFFICE OF
INMATE GRIEVANCES AND APPEALS

October 10, 2001

William Clark, AY-5585
SCI-Rockview

Re: DC-ADM 804 – Final Review
Grievance No. ROC-0641-01

Dear Mr. Clark:

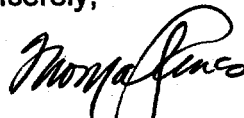
This is to acknowledge receipt of your appeal to final review of the above numbered grievance.

In accordance with the provisions of DC-ADM 804, effective January 1, 2001, I have reviewed the entire record of this grievance; including your initial grievance, the grievance officer's response, your appeal from initial review and the superintendent's response. I have also carefully reviewed the issues you raise to final review.

Upon completion of this review, it is the decision of this office to uphold the responses provided by staff at the institutional level. It appears that the medical personnel, including Dr. Symons, are acutely aware of your medical condition and despite your request from specific treatment protocols, monitoring of your conditions is ongoing. I see no legitimacy in your grievance based on the care being administered.

The responses provided at the institutional level are appropriate and in accordance with Department of Corrections policies and procedures. Accordingly, your appeal to final review must be denied.

Sincerely,



Thomas L. James
Chief Grievance Coordinator

TLJ/rh

cc: Superintendent Meyers
Grievance Office
Central File

Certificate Of Service

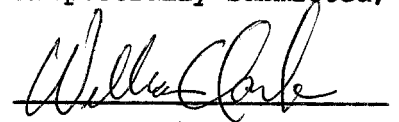
I, William Clark, certify I have this day served upon the indicated persons "Plaintiff's Motion and Brief In Support Of Motion For The Appointment Of Counsel", by placing same in the United States Mail, postage prepaid, addressed as follows:

James D. Young, Esq.
301 Market St., Suite 800
P.O. Box 1245
Harrisburg, Pa. 17108-1245

John J. Talaber, Esq.
Office Of Chief Counsel
55 Utley Drive
Camp Hill, Pa. 17011

Date Mailed: 8/20/02

Respectfully Submitted,

A handwritten signature in cursive script, appearing to read "William Clark", written over a horizontal line.

William Clark, pro se
Box A AY-5585
Bellefonte, Pa. 16823